

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN RE:

Michael P. Scarber

CHAPTER 13

Debtor(s).

CASE NO. 19-58075-mar
JUDGE Mark A. Randon

/

DEBTOR'S CHAPTER 13 CONFIRMATION HEARING CERTIFICATE

At the next confirmation hearing in this case, Debtor intends to: [Check ONE of the following]

1. Request confirmation of the debtor's plan, because all timely objections of creditors and the trustee have been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order.

2. Request confirmation of the debtors' plan, even though all timely objections have not been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order. The parties are at an impasse in attempting to resolve these objections despite all reasonable efforts. The following are: (a) the parties whose timely objections have not been resolved; (b) their unresolved objections; and (c) the legal and factual issues that must be resolved by the Court in connection with confirmation:

3. Request an adjournment of the confirmation hearing to March 2021 or other available date, due to the following good cause:

Franklin Credit has a lien on the debtor's personal residence. The obligation to pay this lien was discharged in the Debtor's 2011 Chapter 7 bankruptcy. Debtor's counsel and Franklin's counsel have been trying to reach an amicable resolution and need additional time.

4. Dismiss the case. [The Court will construe this as a motion by the debtor to dismiss the case under Fed.R.Bankr.P. 1017(f)(2), and the Court will enter an order of dismissal and the case will be removed from the docket, unless the case was previously converted from Chapter 7, 11, or 12 to Chapter 13. In that event, a separate motion to dismiss must be filed within 10 days.]

5. ___ Convert the case to chapter 7. [The debtor must promptly file a separate notice of conversion under Fed.R.Bankr.P. 1017(f)(3) and pay the filing fee for such notice. Such notice of conversion will cause the case to be converted without the entry of an order of conversion.]

Respectfully submitted

MAXWELL DUNN LAW

/s/ Scott A. Gies

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